

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

CR. NO. 17-20595

v.

HON. VICTORIA A. ROBERTS

YOUSSEF RAMADAN,

Defendant.

MOTION FOR TEMPORARY MODIFICATION OF BOND CONDITION
TO ALLOW TRAVEL TO PALESTINE

Defendant Yousef Ramadan, through his attorney, Andrew Densemo, of the Federal Community Defender, hereby moves this court to temporarily modify his bond conditions to allow him to travel to Palestine to attend his son's surgery on July 30, 2021. In support of same, Mr. Ramadan states as follows:

1. Mr. Ramadan was released on bond on January 15, 2021.
2. Several status conferences and bond review hearings have been held since Mr. Ramadan's release.
3. Subsequent to most of these hearings the Court amended and/or terminated certain restrictive conditions of Mr. Ramadan's bond.

4. The Court's decision to do so was guided by Pre-Trial Services' reports of Mr. Ramadan's strict compliance with his bond condition. To date, Mr. Ramadan's bond conditions have been modified to less restrictive conditions several times. Mr. Ramadan has proven that he is committed to complying with all bond conditions set by the court.

5. Mr. Ramadan requests that the bond condition requiring him not to travel outside the state of Michigan be temporarily modified for approximately 14 days so that he can attend his son's surgery in Palestine on July 30, 2021.

6. Attached is a letter from Dr. Raouf Azar, Urology & Urosurgery, (Exhibit 1) who states that Mr. Ramadan's son, Mohammed Yousef Ramadan, age 12, is scheduled to undergo surgery July 30, 2021.

7. Mr. Ramadan hasn't seen his children in nearly four years and humbly asks this court to allow him to be present for his son's surgery. If allowed to attend his son's surgery Mr. Ramadan plans to return to the United States at least three weeks prior to the September 9, 2021 trial date. Mr. Ramadan has rejected plea offers that would have provided for a substantially reduced sentence in exchange for his renunciation of his U.S. citizenship. He will continue to fight to remain a citizen of this country. He can only continue that fight if he is present in the U.S. As the Court is aware, Mr. Ramadan has already served a significant portion of the sentencing

range calculated by the probation department. These factors should obviate any fear that Plaintiff has that Mr. Ramadan will not return to the U.S. for the upcoming trial.

8. The defense sought concurrence from the Plaintiff but was unable to gain concurrence in the relief requested.

WHEREFORE, Defendant respectfully requests that this Court enter an Order temporarily allowing him to travel outside the United States in order to attend his son's surgery in Palestine.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

ANDREW DENSEMO (P37583)

Attorney for Defendant

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Dated: July 21, 2021

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Defendant.

_____ /

**BRIEF IN SUPPORT OF
MOTION FOR RELEASE ON UNSECURED BOND**

I.

BACKGROUND

Defendant re-alleges the factual representation made in his Motion for Bond. This Court has the authority, pursuant to 18 U.S.C. § 3145(a)(2), to amend the previous order of release.

CONCLUSION

Based on the foregoing, Defendant respectfully requests this Honorable Court temporarily modify the conditions of his bond and allow him to travel outside the United States in order to attend his son's surgery in Palestine.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

ANDREW DENSEMO (P37583)

Attorney for Defendant

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CERTIFICATE OF SERVICE

I, hereby certify that on July 21, 2021, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Doug Salzenstein and Jonathan Goulding
Assistant United States Attorneys
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FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

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